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December 20, 2013



Dr. Burl Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

**RE: In the Matter of Utility Renewable Energy Cost Impact Reports Required by Minnesota Statutes Section 216B.1691, Subd.2e.
Docket No. E999/CI-11-852
Comments**

Dear Dr. Haar:

Otter Tail Power Company ("Otter Tail") hereby submits its comments to the Minnesota Public Utilities Commission ("Commission") on Utility Energy Cost Impact Reports in the above docket.

Otter Tail has electronically filed this document with the Commission and is serving a copy on all persons on the attached service list for this docket. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at 218-739-8417 or at bhdraxten@otpc.com.

Sincerely,

/S/ BRIAN DRAXTEN
Brian Draxten
Manager, Resource Planning

wao
Enclosures
By electronic filing
c: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of Utility Renewable Energy
Cost Impact Reports Required by Minnesota
Statutes Section 216B.1691, Subd.2e.

Docket No. E999/CI-11-852

**OTTER TAIL POWER COMPANY'S
COMMENTS**

I. INTRODUCTION

Otter Tail Power Company (“Otter Tail” or “Company”) respectfully submits the following comments in the above-captioned matter.

Otter Tail believes the long term cost of complying with the Minnesota Renewable Energy Standard (“RES”) to be zero, since Otter Tail has to-date added its REO-compliant wind resources as part of its least-cost resource plan. On December 2, 2013 Otter Tail submitted its Integrated Resource Plan (Docket No. E017/RP-13-961). One of the requirements of the resource plan is to provide an estimate of the rate impact to comply with the RES. Additionally, and for reference, Otter Tail has included the portion of the IRP that addresses the RES rate impact estimate as Attachment A.

Otter Tail’s approach to estimating the rate impact of RES compliance is to compare the RES costs (purchased power plus revenue requirements for Otter Tail-owned RES resources) on a MWh basis to the average energy market price (OTP.OTP load zone day-ahead market price for historical comparison; forecasted market prices for future years). The resulting cost/benefit (on \$/MWh basis) is applied to the customer load to show the percent increase/decrease of the RES on customer rates. When Otter Tail does resource planning, the objective is to meet long-term resource needs, on a least-cost basis, with currently available resource options based upon integrated resource planning objectives - therefore short range comparisons to market prices, while informative, may not be an indication of the long-term value of the resource.

II. COMMENTS ON PROPOSED FOUR (4) GENERAL GUIDING PRINCIPLES

Otter Tail is supportive of the four general guiding principles proposed by MPUC staff.

- 1) *Foster transparency*, by using publicly available (or aggregated) information;
- 2) *Support consistency, coordination and non-burdensome administration*, by utilizing utilities' integrated resource planning, electric transmission planning, financial statements, FERC filings, tariffs and other already produced reports, documents or models including the biennial compliance reports required under Minn. Stat. §216B.1691, Subd. 3 (a); annual qualifying facilities reports (e.g., Docket 13-09).
- 3) *Provide realistic representation of baseline, actual (to date) and future expected costs for achieving and maintaining standard compliance*, by using clearly identified and validly supported inputs, with limitations specifically noted;
- 4) *Enable comparison across utilities*, by using similar methodologies with easy to understand illustrations including narrative explanations of estimated rate impact of standard compliance for wholesale and retail rates, as applicable.

III. COMMENTS CONCERNING ATTACHMENT II: PROPOSED FORMAT FOR UNIFORM REPORTING SYSTEM

- A) Staff proposes a start date of 2005 out through 15 years from each utility's next filed IRP. Does this provide a reasonable and useful format to capture a starting point (benchmark) as well as forecast of cost impacts to comply with the statute?*

Otter Tail Response: Otter Tail has used 2008 as the start date for its IRP rate impact analysis and would recommend 2008 as the start date for the uniform reporting system to be consistent with Otter Tail's resource plan and to coincide with Otter Tail-owned REO/RES resources being commissioned starting in late 2007.

- B) Should REO expenditures be included in the renewable energy rate impact analysis, why or why not? Are all REO eligible projects online and operating, or, are some in development? Staff assumes that this row eventually 'phases out' without any additional cost apart from those already incurred. Is that a correct assumption?*

Otter Tail Response: Otter Tail recommends inclusion of REO costs in the rate impact analysis. Otter Tail is indifferent to the separation or combination of the REO from the RES. If REO and RES are separated, Otter Tail would assume that the REO would stop after 2011 and the RES would start in 2012.

- C) The statute lists required reporting cost activities to include (without limitation) renewable energy purchases, generation facility acquisition and construction, and transmission improvements. Staff assumes these categories, often referred to as RES*

in total to include utility-owned generation, power purchases agreements, market purchases and renewable energy credits (REC). Should expenditures for RES be calculated separately from those for REO and eventual SES? Why or why not?

Otter Tail Response: For item C above, Otter Tail interprets “expenditures” to mean “revenue requirements.” This interpretation is significant for the analysis associated with utility-owned generation. Otter Tail recommends that the SES be separated from the REO/RES analysis. For Otter Tail, wind energy has been part of the “least-cost” resource mix while meeting the REO/RES. However, unless the costs of procuring solar resources change dramatically, meeting the SES is not likely to be part of Otter Tail’s “least-cost” resource plans within the timeframe of compliance for the SES.

- D) Are expenditures for REO, RES (SES in the future) separately accounted for and calculated by the utility? Would there be different treatment as to cost inclusion for on-line projects versus those in development or executed contracts for historical REO, RES (eventual SES) projects? Should both levelized and annualized costs be provided in order to show short-term impact on rates vs. expected long-term effects?*

Otter Tail Response: Otter Tail anticipates having to create a new “Cost of Service” type report to capture the REO/RES/SES revenue requirements. This report does not currently exist and will create additional administrative burden. Long-term effects should always be considered in resource selection.

- E) Would it be more useful, as well as ease the administrative burden, to differentiate renewable energy (RE) expenditures in rows such as “RE Costs – Online”, “RE Costs– In Development”, “RE Net Short” and Total RE Costs” as opposed to rows B – E identified in Table 1; why or why not? What source(s) will the utility use to report renewable energy expenditures, regardless of category? Examples: FERC uniform system of account (FERC Form 1); REO-RES biennial reports; company financial statements. Please be specific and refer to the general guiding principles in your response.*

Otter Tail Response: Otter Tail does not recommend differentiating between the “development” vs “online” costs. Otter Tail does not have a single source document that would capture the revenue requirements associated with meeting the RES and Otter Tail anticipates having to create a new “Cost of Service” type report that does not currently exist and expects this to create additional administrative burden.

- F) List the best available ‘source’ from which to report and calculate, non-renewable generation revenue requirement. Going forward, what would be the pros and cons of using the utilities latest approved rate case? For historical purposes (2005 baseline) would it be the closest to that year’s approved rate case revenue requirement? In both cases, Staff assumes the utility is capable of distinguishing revenue requirements into the following categories: generation, distribution and transmission.*

Otter Tail Response: As mentioned in E above, Otter Tail does not have a “source” that would be specific to non-renewable generation revenue requirement, but would expect that a new “Cost of Service” type report would need to be created to generate the requested information.

- G) There are many ways one could report, estimate, measure and compare, across utilities, the expected cost to comply with Minn. Stat. § 216B.1691. Please provide your comments, alternatives (if any) on whether the proposed uniform reporting system is reasonable and whether it meets the statute requirements (note strengths and shortcomings as applicable).*

Otter Tail Response: Otter Tail has included the portion of the IRP that addresses the RES rate impact estimate as Attachment A for reference purposes. Otter Tail’s approach to estimating the rate impact of RES compliance is to compare the RES costs (purchased power plus revenue requirements for Otter Tail-owned RES resources) on a MWh basis to the average energy market price (OTP.OTP load zone day-ahead market price for historical comparison; forecasted market prices for future years). The resulting cost/benefit (on \$/MWh basis) is applied to the customer load to show the percent increase/decrease of the RES on customer rates.

- H) As one alternative, row H offers the ‘but for the renewable mandate consideration for comparison purposes. Should ‘supply-side’ expenditures include solely a ‘gas-only’ proxy/alternative? Some states use ‘cost of new entry’ (CONE) for comparison purposes. Some use ‘avoided cost’ in addition to looking at the utility’s ‘system average’ with relation to the costs of meeting renewable energy mandates. What would be the advantages or disadvantages of including any of these metrics for comparison purposes? Should a row be included to input both annual peak and off-peak market prices (public sourced)? Please explain why or why not.*

Otter Tail Response: Please see G above.

IV. CONCLUSION

Otter Tail Power Company is well positioned to meet its Minnesota RES through 2025. The Company has added its REO-compliant wind resources as part of its least-cost resource plan and therefore has added renewable resources that, over the long term, actually reduce cost to customers. Otter Tail is supportive of developing a uniform format for utilities to report their cost of meeting the Minnesota RES.

Thank you for the opportunity to comment on the issue of renewable energy cost impact reporting.

Dated: December 20, 2013

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ *BRIAN DRAXTEN*

Brian Draxten

Manager, Resource Planning

Otter Tail Power Company

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Attachment A

(Source: Otter Tail Power Company’s 2013 Resource Plan, Docket No. E017/RP-13-961)

To estimate the cost/benefit of RES compliance, Otter Tail compared the cost of Otter Tail’s RES eligible resources to the market energy costs. Figure 5-5 shows the comparison. Historical values are used for 2008 through 2012. Forecasted values are used for 2013 through 2028. When the average day-ahead market price is below the RES cost it is a “cost” year (2009-2013). When the average day-ahead market price is above the RES cost, it is a “benefit” year (2008, 2014-2028).

Figure 5-5: RES Resource Cost Compared to Average Market Costs

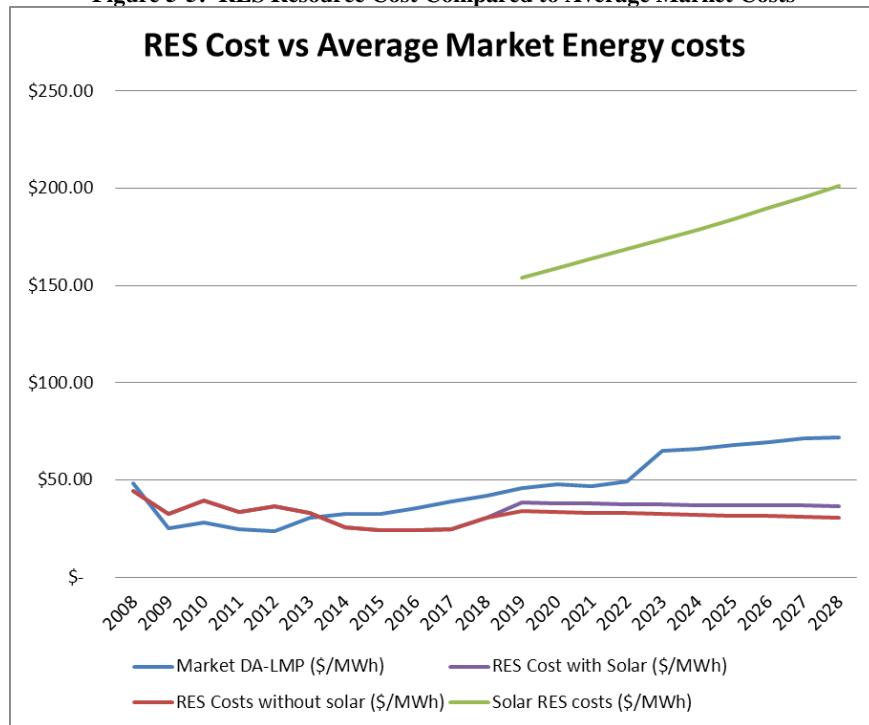
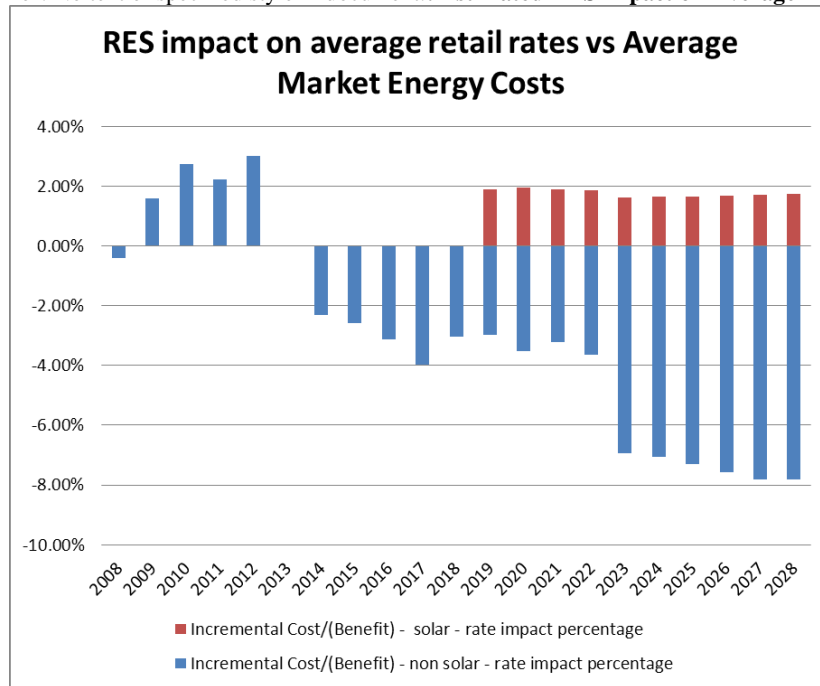


Figure 5-6 shows the estimated impact of the RES on average retail rates when comparing RES resources to the average energy market price. The solar portion of the RES is estimated to have a 2 percent increase in rates while the remainder of the RES is expected to have a benefit when compared to the average energy market prices (Figure 5-6 does not attempt to compare the cost/benefit of the RES additions to alternative non-market resources). The wind portion of the RES provides 19 percent of the Company’s system-wide energy requirement while the solar portion provides 1.5 percent of the Company’s Minnesota load (0.75 percent of system-wide energy).

Figure Error! No text of specified style in document.: Estimated RES impact on Average Retail Rates



CERTIFICATE OF SERVICE

**RE: In the Matter of Utility Renewable Energy Cost Impact Reports Required by
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Docket No. E999/CI-11-852**

I, Wendi A. Olson, hereby certify that I have this day served a copy of the following, or a summary thereof, on Dr. Burl W. Haar and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by first class mail.

**Otter Tail Power Company
Comments**

Dated this **20th** day of **December 2013**.

/s/ WENDI A. OLSON
Wendi A. Olson
Regulatory Filing Coordinator
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Interested Party Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Steve	Thompson		Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Paper Service	No	SPL_SL_11- 852_Interested Parties
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Douglas	Tiffany	tiffa002@umn.edu	University of Minnesota	316d Ruttan Hall 1994 Buford Avenue St. Paul, MN 55108	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	Suite 325 7301 Ohms Lane Edina, MN 55439	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Darryl	Tveitbakk		Northern Municipal Power Agency	123 Second Street West Thief River Falls, MN 56701	Paper Service	No	SPL_SL_11- 852_Interested Parties
Roger	Warehime	warehimer@owatonnautilities.com	Owatonna Public Utilities	208 South Walnut PO Box 800 Owatonna, MN 55060	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind	618 2nd Ave SE Minneapolis, MN 55414	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Thomas J.	Zaremba		WHEELER, VAN SICKLE & ANDERSON	Suite 801 25 West Main Street Madison, WI 537033398	Paper Service	No	SPL_SL_11- 852_Interested Parties